



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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MAR 15 2010

Ref: 8EPR-N

Robert G. MacWhorter, Forest Supervisor
Dixie National Forest
1789 N. Wedgewood Lane
Cedar City, UT 84721

Re: Tropic to Hatch 138 kV Transmission Line,
Draft Environmental Impact Statement and Draft
Grand Staircase-Escalante National Monument
Management Plan Amendment. CEQ #20090414

Dear Mr. MacWhorter:

The U.S. Environmental Protection Agency (EPA) Region 8 reviewed the Tropic to Hatch 138 kV Transmission Line, Draft Environmental Impact Statement (DEIS) and Draft Grand Staircase-Escalante National Monument Management Plan Amendment in accordance with EPA's responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2)(C), and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609.

The DEIS evaluates the environmental effects of Garkane Energy Cooperative's (Garkane's) proposal for the construction, operation and maintenance of a 138-kilovolt (kV) transmission line on lands currently managed by the U.S. Forest Service (USFS), Dixie National Forest; U.S. Bureau of Land Management (BLM), Grand Staircase-Escalante National Monument (GSENM); State of Utah School and Institutional Trust Lands Administration, and potentially the National Park Service (NPS), Bryce Canyon National Park (BCNP). Garkane has filed applications for special use permits and/or rights-of-way grants with the USFS, BLM, and NPS. The lead agency for the DEIS is USFS and the cooperating agencies are the BLM and NPS. The proposed project would replace some or all of an existing 69 kV transmission line and increase the capacity of Garkane's electrical delivery system between the communities of Tropic and Hatch, in Garfield County, Utah.

The DEIS analyzes a no action alternative and the following three action alternatives:

- **Alternative A** (The Proposed Action and Preferred Action Alternative) is the construction of a 138 kV transmission line from a proposed East Valley Substation east of Tropic to the Hatch Substation along a 30.41 mile route. The route crosses through sections of GSENM and DNF. The project includes removal and reclamation of a portion of the existing 69 kV transmission line west of the Bryce substation. Implementation of the Proposed Action would require the amendment of the GSENM Management Plan (MMP) (2000) to change the designation of a 100-foot wide 3.68-mile long stretch (44.58 acres) of the Primitive Zone to Passage Zone, and within this area, downgrading the existing Visual Resource Management (VRM) Management Class designation from Class II to Class III.
- **Alternative B** (the Parallel 69 kV Line Route Alternative) is the construction of a 138 kV transmission line along a 29.11 mile route roughly corresponding to the existing 69 kV transmission line rights-of-way. The route crosses BCNP and DNF.
- **Alternative C** (the Cedar Fork Southern Route Alternative) is the construction of a 138 kV transmission line along a 29.78 mile route that crosses through GSENM and DNF. This alternative would require the amendment of the GSENM Management Plan to change the designation of a 300-foot wide 3.68-mile long stretch (133.81 acres) of the Primitive Zone to Passage Zone to accommodate both the proposed right-of-way and the existing 230 kV Rocky Mountain Power/PacifiCorp transmission line, as well as provide for future utility needs; and within this area, downgrading the existing VRM Class designation from Class II to Class III.

There are many important public lands affected by the action alternatives. EPA has specific concerns about resources potentially impacted in GSENM and BCNP. Alternative A and C cross through GSENM in an area designated as “primitive” in the MMP and in a VRM Class II area (pg 1-10 DEIS). Alternative B crosses through BCNP. The GSENM’s unique scenic assets are outstanding for many reasons, including the lack of large industrial developments that would mar the vistas and viewsheds. The GSENM landscape includes a wide array of scientific and historic resources. The inventory of visual resources was updated in recognition of these important assets after the creation of the GSENM. The proposed power corridor is in a VRM Class II area. The objective of this class is to retain the existing character of the landscape; consequently, the level of change to the characteristic landscape should be low. Furthermore, we understand that BLM has identified areas, including Box Canyon and the Blues Wilderness Study Area, with wilderness characteristics in portions of the GSENM where the proposed power line would be located. In order to ensure long-lasting protection for these sensitive and unique public lands, EPA recommends avoidance and the adoption of Best Management Practices in locations where the transmission corridor will be located.

EPA recommends looking at additional alternatives that do not cross sensitive and unique public lands. One suggestion we have is to develop an alternative that uses corridors that run along Highway 89 from a northern energy source. If there are constraints that led USFS to screen out such alternatives from detailed analysis, the EIS should discuss those constraints. The Final Environmental Impact Statement (FEIS) should also clarify why the DEIS does not analyze in detail the use of energy corridors identified in the Record of Decision for the "Designation of Energy Corridors on Federal Lands in Eleven Western States," signed in January of 2009 by the U.S. Department of Agriculture (ROD). The ROD's stated purpose is to "identify energy corridors to facilitate future electricity transmission and distribution facilities on Federal lands in the West to meet the region's increasing energy demands while mitigating potential harmful effects to the environment."

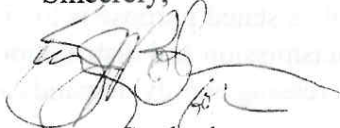
The DEIS explains that in the past 5 years, Garfield and Kane Counties have experienced a 66 percent increase in the demand for electricity, and that the existing 69 kV electrical transmission system from Tropic to Hatch is operating at its capacity and cannot be modified to carry higher voltages due to physical limitations (pg 4-230). In addition to considering additional energy supply to address this need, EPA recommends that the FEIS discuss how to measure or improve energy efficiency in the service area in order to reduce demand. We recommend that the FEIS incorporate energy conservation and electric demand management as part of all the alternatives analyzed.

The DEIS does not fully discuss impacts of the proposed action on drinking water sources. EPA recommends additional information to be included on whether or not the transmission line will be constructed through any Drinking Water Source Protection Zones designated by the State of Utah. Also, we suggest the FEIS identify whether there are local drinking water protection ordinances in place or plans to implement the Best Management Practices identified in the State's Drinking Water Source Protection Plan. We recommend contacting Kate Johnson at Utah Department of Environmental Quality, (801) 536-4206 (katej@utah.gov), for more information on this matter.

Pursuant to EPA policy and guidance, EPA rates the environmental impact of the preferred action and the adequacy of the NEPA analysis. EPA has rated the DEIS as "EC-2" (Environmental Concerns - Insufficient Information). The "EC" rating indicates that the EPA review has identified environmental impacts associated with the preferred action that should be avoided in order to fully protect the environment. The "2" rating indicates that EPA has identified additional information, data, analyses, alternatives or discussion that should be included in the FEIS.

Thank you for the opportunity to provide comments on the DEIS. If you have any questions or would like to discuss our comments, please contact Sarah Hester of my staff at (303) 312-6008, or you may contact me at (303) 312-6004.

Sincerely,

A handwritten signature in black ink, appearing to read 'Larry Svoboda', with a stylized flourish at the end.

Larry Svoboda

Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation

Enclosure: EPA's rating criteria